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July 3, 2019

**VIA EMAIL**

The Hon. Judge Cathy Seibel  
300 Quarropas St., Courtroom 621  
White Plains, NY 10601-4150

**LETTER RE EMERGENCY MOTION FOR CLARIFICATION AND ENFORCEMENT OF ORDER**

Dear Hon. Judge Seibel:

I am the Intervenor in the case of Can't Stop v. Sixuvus, Ltd. I must say that I am confused by the Court's order dated July 2, 2019 in that I'm not certain of it being the court's clarification of the subject TRO order as requested, or whether the court instead plans to resolve the issue at the upcoming status conference.

It is my understanding that ordinarily when a motion for clarification is brought, the court will either grant or deny the motion. If the motion is granted, only then would the court proceed to explain or justify the issues at hand. Here, it is unclear whether the Order dated July 2, 2019 is the Court's clarification considering that the Sixuvus defendants did not file their requested response, yet the court seems to have made arguments in their defense whereas now any opposition by them would seem moot at this stage.

It is unfortunately apparent to me that this Court lacks sufficient understanding of the social media terms of art contained in the TRO such as "Page," "disable," and/or

“transfer.” But I do understand those terms. Therefore, it is unfair for the Court to have issued the TRO with use of those terms and expect those like me, who do understand those terms in the context of social media, to not expect the Court to apply those generally accepted social media terms of art.

Indeed, to disable a Page at Facebook means to shut down the Page either temporarily or permanently. *See attached information on Facebook disabled accounts.* “[T]he transfer of the content... to a different URL” means to move content from one Page to another, i.e. OfficialVillagePeople at Facebook to “TheKingsofDisco1” at Facebook.

If the Page remains and one simply changes the URL and name (as an administrator) to the KingsOfDisco, you have not transferred, or “disabled” anything as Facebook has already made clear to me and well as the Court.

The Court’s seemingly insufficient knowledge of social terms of art is evident when it stated in the Order dated July 2, 2019 that “[i]t appears Defendants have disabled their verified Facebook Page “Official Village People.”

However, this seems clear err on behalf of the Court because as Facebook has already made clear, the Official Village People was never disabled by the Sixxvus. The page still exists today as the Kings of Disco. It seems the Court is unable to comprehend how this can be, yet I’ve explained it ad nauseum. The only question is whether the court is willing to fairly entertain argument on the issue in order to fully understand the facts and to clarify or subsequently correct itself if warranted. I have also made it clear to the court that the continued administration of the Village People page under the

auspices of Kings of Disco is causing public confusion and that if the page is not immediately shut down or disabled, the Village People brand will suffer irreparable harm. I then included Exhibit 1 as an example of how the Sixxvus are abusing their continued administration of the Village People page under the name Kings of Disco. Yet the court feigns ignorance of the urgency.

All the evidence of the Kings of Disco page still being the official Village People Page is there, including the Village People verification symbol. Facebook has not VERIFIED the Kings of Disco. This fact was confirmed to me by Facebook. That is the Village People certification at the Kings of Disco Facebook Page. All of the Village People content is still at the Page. All of the Village People LIKES are still at the Page. The Kings of Disco did not gain those LIKES. Those are Village People LIKES, not the Kings of Disco LIKES. IT IS STILL THE OFFICIAL VILLAGE PEOPLE Page.

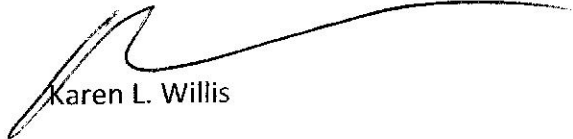
It matters not that the Sixxvus as administrators of the official Village People page simply went into the control panel and changed the name and URL and now one can no longer find the official Village People URL. The official Village People URL could be reverted back at any time, because it's still the Village People page that was never disabled or shut down as the Court led me to believe through the TRO, would occur. The Page still "purports" to be the Village People because all of the Village People content, VERIFICATION symbol, and LIKES are still there.

I just don't know what else to do now other than to ask the Second Circuit to resolve this issue because this Court seems overly sympathetic to the Sixxvus, and Can't Stop seems uninterested in protecting its own mark which will likely come back to bite

them at some point soon. But at least now, it falls on me as the Intervenor and licensee to protect the Village People mark.

Therefore, I am done with this issue and will not seek any further clarification but will simply accept whatever the Court decides to do from this point on with respect to this issue, and proceed accordingly.

Respectfully submitted,



Karen L. Willis

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If your account is disabled, you won't be able to log in. Please keep in mind that there are many reasons why an account might be disabled, and we handle each of these cases differently.

### My Account's Disabled

### My Friend or Child's Account is Disabled

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### My Account's Disabled

#### How do I know if my Facebook account has been disabled?

If your Facebook account has been disabled, you'll see a message saying your account is disabled when you try to log in. If you don't see a disabled message when you try to log in, you might be having a different login problem. [Learn how to](#)

#### Why is my account disabled?

We disable Facebook accounts that don't follow the [Facebook Terms](#). Some examples include:

- Posting content that doesn't follow the Facebook Terms.
- Using a fake name.
- Impersonating someone.
- Continuing behavior that's not allowed on Facebook by violating our Community Standards.
- Contacting other people for the purpose of harassment, advertising, promoting, or other conduct that's not allowed.

#### What can I do if my account has been disabled?

If you think your account was disabled by mistake, please [appeal your account](#).

Keep in mind that in some cases we may not issue a warning before disabling your account. We can't restore accounts that were disabled for severe violations of the [Facebook Terms](#).

Was this information helpful?

### My Friend or Child's Account is Disabled

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